

Before the  
Federal Communications Commission  
Washington D.C. 20554

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In the matter of

Amendments to the amateur service )	WT Docket No. 95-57
rules including amendments for )	RM-8301
examination credit, recognition of)	RM-8418
the volunteer session manager and )	PR Docket <u>93-105</u> /
special call signs )	

The Anchorage Amateur Radio Club, Inc. VEC has the following comments:

**RM-8301**

It is without a doubt that the Volunteer Examiner Coordinator (VEC) program has been an outstanding success using amateur radio operators acting as volunteer examiners for the FCC to administer amateur radio examinations. Each VEC has designed their program as they wished within established guidelines by the FCC. The VEC's have their own record keeping systems indicating who passed and failed, the names of the volunteer examiners (VE's) at each session, elements passed and failed, and money reimbursed (Anchorage Amateur Radio Club VEC does not charge for examinations), etc. etc. It appears another regulation will be thrust upon the VE's even though the present system is working. Why fix something that isn't broke?

We have the following concerns.

How is the FCC going to enforce this regulation?

What will happen if the VE session manager (VESM) doesn't fulfill his/her duties and what will the penalty(ies) be?

Who is to determine if the work is not completed properly?

Will the VEC's be required to send to the FCC a completed form indicating that the required duties were performed by the VESM?

Will the FCC provide a form to be sent along with the FCC Form 610's and examination test report for each examination session?

As a result of the American Disability Act, the federal government required communities to provide handicap access and then ended up funding the amenities.

If a requirement is made, then there has to be a checking system by which compliance to the regulation is adhered to.

The coordinating VEC may just file it away and forget about it and 15 months later throw the paperwork away. We certainly do not want the "hen house to be guarded by the fox".

Since a General class licensee can administer Technician class examinations, it is conceivable that a VESM with a General class license may supervise, conduct, and collect all paperwork, including higher class theory and code examinations at an examination session having Extra class VE's. Here is one way

for a person to have access to the examinations and be sanctioned by the FCC.

Finally, this proposal would dilute or eliminate entirely the administering VE's supervisory role in the examination process. It is the responsibility of the VE's to ensure that the examination process is properly adhered to. Having only one person be responsible at the examination sessions only eliminates any liability on the part of the examiners.

The Anchorage Amateur Radio Club VEC's belief in trying to run the VEC system with the VE's is to keep it as simple as possible and still have a functional and viable program. Why impose more regulations on a system that already works. As the old saying states, "if it isn't broke, don't fix it".

#### **RM-8418**

Even though former license holders did indeed pass examinations before failing to renew the license, technology and the rules and regulations for the amateur service have changed. Those former license holders would not have kept abreast with the changes during their time away from the amateur service. Therefore, they should be treated just like anybody else entering the amateur service for the first time.

It is stated that "...this proposal would relieve the VE's from the burden of preparing and administering examinations for former license holders". What burden are you talking about? Are there so many more of these former license holders that they out-number the present applicants obtaining licenses. Another applicant is just that, another applicant. Some VE teams require that the applicants register in advance of the examination session and therefore know how many applicants are going to be there. Other examination sessions are on a "walk-in basis" only. The VE's are prepared for excess applicants in these situations. To say that it would be a burden that former license holders would place on the VE's to prepare and administer an examination is to say that is a burden on the VE's to prepare and administer examinations to other applicants as well. If it was a burden on the VE's, we are certain that the VE's would have given up long time ago. Statistics provided by the FCC definitely do not reflect this with more and more examination sessions being administered each year. If a person wanted to keep his/her license, that person would not have let it lapse. We question if there are a lot of former license holders or is this just a few former license holders that don't think they have to abide by the present rules and regulations just because they once passed tests previously. It certainly appears that if people can't play the game by the rules all you have to do is change the rules so you can win. We believe that only a few will be affected and not a multitude.

If this proposal is accepted, the former license holder must be required to prove that he/she did indeed have a previously issued

FCC license. We therefore believe that the word "**original**" be added to the proposed rule to read as follows: "An **original** FCC-issued amateur operator license:...". The proposal should also indicate that a photocopied license not be allowed. This would eliminate any possible fraud. Just as candidates at VEC examinations are required to bring their original licenses, so should these former license holders be required to do so for proof.

Also, if this proposal is accepted there should be no credit for other types of licenses held since many licenses do not even come close to the scope of an amateur license. Are you going to allow a former holder of a citizen band license issued by the Commission to be allowed credit. If you give credit for an amateur license issued by a foreign government, how would the VE's equivocate licenses that were obtained in a foreign country with that obtained from the Commission? A foreign country's rules and regulations are quite different from that of ours. How would a VE know if a person presenting an amateur license had a license class comparable to that of one issued by the Commission. It is certainly conceivable that a person could be issued a beginning license in foreign country by just signing for the license and not even taking an examination and then be issued, by the Commission, a license with higher privileges? How would the VE's decipher the foreign amateur's license or even if it was an amateur license at all? For all a VE would know, it might be a liquor license printed in a foreign language.

**PR Docket No. 93-305**

Under this docket concerning special event call signs, we have the following concern. A one letter call sign would be fine for the "main land 48 states", but we question what about those places that have two letter designators in the prefix of the call sign, i.e. Alaska, Hawaii, Puerto Rico, and other territories of the United States. We could just see somebody identifying "K1W" as a special event station in Alaska and every radio operator not knowing that it was in Alaska. A special event station should be at least indicative of the area of operation too.

Anchorage Amateur Radio Club Inc, VEC

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